

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

| | | |
|-------------------------------------|---|---------------------------------------|
| IAN HUNTER LUCAS, |) | |
| Plaintiff, |) | Civil Action No. 3:23-cv-01359 |
| |) | |
| v. |) | Judge Richardson/Frensley |
| |) | |
| VANDERBILT UNIVERSITY et al. |) | |
| Defendants. |) | |

**DECLARATION IN SUPPORT OF MOTION FOR DISQUALIFICATION OF THE
HONORABLE ELI J. RICHARDSON**

I, Ian Hunter Lucas, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. Parties and Judge Involved:

I am the Plaintiff in the above-captioned matter. The case is currently before the Honorable Eli J. Richardson, United States District Judge.

2. Basis for Recusal Under 28 U.S.C. § 144:

Pursuant to 28 U.S.C. § 144, I submit this declaration requesting that Judge Richardson recuse himself from presiding over this matter. I believe he holds a personal bias and prejudice against me and in favor of the adverse party, Vanderbilt University.

3. Facts Supporting Recusal Due to Personal Bias and Prejudice:

a. Judge's Alumni Status at Vanderbilt University:

Judge Richardson is an alumnus of Vanderbilt University. Because Vanderbilt University is the Defendant in this proceeding, his alumni connection reasonably suggests a predisposition in favor of the University.

b. Judge's Ongoing Professional Association with Vanderbilt University Law School:

Publicly available information (e.g., <https://www.courtlistener.com/person/8628/eli-jeremy-richardson/>) shows that Judge Richardson has served as an Adjunct Professor at Vanderbilt

University Law School from 2016 to the reported present. This ongoing professional role, beyond mere historical affiliation, further underscores the appearance of partiality toward the Defendant.

4. Impact on Judicial Impartiality:

Judge Richardson's continuous and current affiliations with Vanderbilt University create a reasonable doubt about his impartiality. An objective observer could conclude that his role as both alumnus and adjunct professor would make it challenging for him to maintain the unbiased neutrality required in these proceedings.

5. Timeliness of This Declaration:

I submit this declaration promptly upon discovering the facts that lead me to believe bias and prejudice may exist. Should the timing be questioned, I respectfully request a finding of good cause due to the fundamental importance of impartial adjudication.

6. Good Faith of Filing:

I make this declaration in good faith and solely for the purpose of ensuring a fair and impartial review of my case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: December 13, 2024,

Respectfully submitted,

/s/ Ian Hunter Lucas
IAN HUNTER LUCAS
Plaintiff, Pro Se
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CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2024, a copy of the foregoing DECLARATION IN SUPPORT OF MOTION FOR DISQUALIFICATION OF THE HONORABLE ELI J. RICHARDSON was served via the Court's electronic filing system upon counsel of record for Defendant.

/s/ Ian Hunter Lucas
IAN HUNTER LUCAS